REMARKS / ARGUMENTS

Reconsideration of the application and claims in light of the following remarks is respectfully requested.

I. Status of the Claims

Claims 1, 3 and 7-17 are pending in the present application.

Claims 2 and 4-6 were previously cancelled without prejudice or disclaimer of the subject matter contained therein.

Claims 1, 3 and 7-17 were rejected.

No amendments to the claims are included in this response.

II. Reply to 'Response to Arguments' of the Office Action

In the Response to Office Action of October 6, 2010, Applicants argued, among other things, that the cited prior art fails to disclose or suggest "speaking the vocabulary data to the speech recognition system in an automated manner using the audio module so as to expand the vocabulary database," as recited in claim 1. In response to this argument, the Office asserted that "automating requires routine skill in the art and as the court held broadly providing an automatic or mechanical means to replace a manual activity which accomplished the same result is not sufficient to distinguish over the prior art." *See* Detailed Action, Section 2, Page 2. It is respectfully submitted that this assertion by the Office ignored the other arguments made in Applicants' October 6th Response, specifically that any combination of the cited prior art, to the extent proper, fails to disclose or suggest providing vocabulary data in a streaming mode from a telecommunication network (as argued in greater detail again in Section III below). Further, it is respectfully submitted that this assertion is incorrect at least because the recited automation is not the mere automation of a known manual activity and also provides substantially different results.

In addition to being laborious and time-consuming, having a particular user provide speech data through speaking into a microphone or the like would merely provide acoustic training data that is based on the voice pattern of the particular user, which could differ

greatly from the voice pattern of another person. *See* paragraph [0015] of the original specification. Thus, the data used to train the voice recognition system will not match that of the person who will operate the system later. *See* paragraph [0015] of the original specification. Accordingly, it is respectfully submitted that automating a process where a particular speaker provides speech data through a microphone (as described in Ittycheriah, see below) would not operate to provide different voice patterns, resulting insufficient training of a voice recognition system.

III. Rejections under 35 U.S.C. § 103

Claims 1, 3, 7-11 and 14-17 were rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent No. 6,185,530 to Ittycheriah et al. ("Ittycheriah") in view of U.S. Publication No. 2002/0049848 by Lin et al. ("Lin"). Claims 12 and 13 were rejected under 35 U.S.C. § 103(a) as obvious over Ittycheriah [in view of Lin][1] and in further view of U.S. Patent No. 6,393,348 to Besling et al. ("Besling"). These rejections are respectfully traversed.

Ittycheriah describes a method of comparing a word, which can uttered by a user into a microphone and received by a speech utterance pre-processor, to an existing vocabulary of words to determine potential acoustic confusion. *See* Ittycheriah, Abstract and col. 4, lines 16-25.

Lin describes a method of updating information stored on a memory based on interests of a user as determined by the user's internet browsing or by the content of data stored on a CD. *See* Lin, paragraph [0010]. For example, if the user had browsed web sites related to travel, the web server can send updated travel information to the user's hard disk the next time the user makes a query on a travel-related web site. *See* Lin, paragraph [0020].

Besling describes a system for recognizing a pattern by selecting a recognition model that is suited to a particular user of the system. *See* Besling, col. 4, lines 15-40. Where the input pattern is speech representative data, the user speaks predetermined words or sentences that are used as acoustic training data for recognition by a plurality of acoustic models such

[1] It is assumed that Lin was intended to be included in the rejections of claims 12 and 13 which depend from independent claim 1. Lin was relied on in the rejection of claim 1.

that the acoustic model providing the best recognition result can be used. *See* Besling, col. 7, line 66 – col. 8, line 27.

Independent claim 1 of the present application recites a method for at least one of generating and expanding a vocabulary database of a speech recognition system including "providing the audio module with vocabulary data in a streaming mode from a telecommunication network." Similarly, independent claim 16 recites a "computer-based audio module including a speech synthesis unit configured to receive speech data in a streaming mode from a telecommunication network." It is respectfully submitted that any combination of Ittycheriah, Lin and Besling, to the extent proper fails to disclose or suggest the foregoing features of claims 1 and 16.

In contrast, Ittycheriah merely describes providing a speech utterance pre-processor with words spoken by a particular user to determine potential acoustic confusion. Thus, as acknowledged in the Office Action, Ittycheriah fails to disclose providing an audio module vocabulary data in a streaming mode from a telecommunication network as required by claims 1 and 16 (see Detailed Action, Page 3). While Lin is relied on as disclosing this feature with reference to paragraphs [0003], [0010] and [0016]-[0022] thereof (see Detailed Action, Page 4), it is respectfully submitted that Lin does not, in fact, disclose or suggest this feature. In these cited paragraphs of Lin, a method for updating travel or other webpage information stored in a memory based on interests of a user as determined by the user's internet browsing or by the content of data stored on a CD (such as travel) is described, which update only occurs when the user makes a next query about the interest (see Lin, paragraph [0020]). The updated information is not vocabulary data as required by claims 1 and 16, nor is the data provided in a streaming mode from a telecommunications network, as also required by claims 1 and 16. Moreover, Lin requires to user to make a query before the update is performed; there is no information at all provided in a streaming mode. Thus, Lin fails to disclose or suggest providing vocabulary data, Lin does not provide an audio module, and Lin does not provide any type of data in a streaming mode from a telecommunications network. Moreover, since Lin fails to disclose or suggest providing vocabulary data or an audio module, it is respectfully submitted that Lin is non-analogous and not reasonably pertinent to a voice recognition system or the training thereof. Besling merely describes a method of

recognizing a pattern in which a particular user speaks predetermined words or phrases, and therefore also fails to disclose or suggest providing an audio module vocabulary data in a streaming mode from a telecommunication network as required by claims 1 and 16.

Because Ittycheriah, Lin and Besling fail to disclose or suggest at least the above-recited features of independent claims 1 and 16, it is respectfully submitted that any combination of Ittycheriah, Lin, and Besling, to the extent proper, could not render those claims or any of their respective dependent claims 3, 7-15 and 17. Reconsideration and withdrawal of the respective rejections under 35 U.S.C. § 103(a) is therefore respectively requested.

CONCLUSION

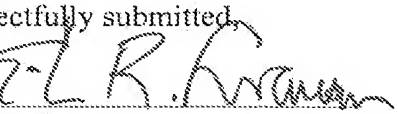
In view of the foregoing amendments and arguments, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

The Commissioner is hereby authorized to charge any unpaid fees deemed required in connection with this submission, including any additional filing or application processing fees required under 37 C.F.R. § 1.16 or 1.17, or to credit any overpayment, to Deposit Account No. 12-1216.

Dated: February 22, 2011

Respectfully submitted,

By 

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